



FRED J. HIESTAND
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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

THE BLACK PANTHER PARTY, an unincorporated
association; HUEY P. NEWTON, Co-Founder and
Chief Representative of the Black Panther
Party; and JANE MURPHY, suing under a
fictitious name individually, and as a
representative of anonymous contributors to
the Black Panther Party,

Plaintiffs,

v.

DONALD C. ALEXANDER, individually and as
Commissioner of the Internal Revenue Service;
WILLIAM E. SIMON, individually and as Secre-
tary of the Treasury; THOMAS A. CARDOZA,
individually and as Regional Commissioner of
the Internal Revenue Service; GEORGE BUSH,
individually and as Director of the Central
Intelligence Agency; REX DAVIS, individually
and as Director of the Bureau of Alcohol,
Tobacco and Firearms of the United States
Treasury Department; J.J. NEWBERRY; CLARENCE
M. KELLEY, individually and as Director of
the Federal Bureau of Investigation; CHARLES
BATES, individually and as the Regional
Director of the Federal Bureau of Investi-
gation; JOHN DOE, RICHARD ROE, JACK POE and
JANE FOE, and the FIRST ENTERPRISE BANK,

Defendants.

No. C-74-1247 AJZ

SUMMONS
(Amended Complaint)

TO THE ABOVE NAMED DEFENDANTS:

You are hereby summoned and required to serve upon FRED
HIESTAND, plaintiffs' attorney, whose address is 1970 Broadway,
Oakland, CA 94612, an answer to the amended complaint which is
herewith served upon you within 60 days after service of this
summons upon you, exclusive of the day of service. If you fail
to do so, judgment by default will be taken against you for the
relief demanded in the complaint.

Date:

FEB 12 1976

WILLIAM L. WHITTAKER

CLERK OF THE COURT

G. COWNE
Deputy Clerk

ORIGINAL
FILED

FEB 12 1976

WILLIAM L. WILKINSON
CLERK, U. S. DIST. COURT
SAN FRANCISCO

FRED J. HIESTAND
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Firearms of the United States
Treasury Department; J.J. NEWBERRY;
CLARENCE M. KELLEY, individually
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Bureau of Investigation; CHARLES
BATES, individually and as the
Regional Director of the Federal
Bureau of Investigation; JOHN DOE,
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and the FIRST ENTERPRISE BANK,

Defendants.

No. C-74-1247 AJZ

SECOND AMENDED COMPLAINT

UNCLASSIFIED	CONFIDENTIAL	SECRET
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EXECUTIVE SECRETARIAT

Routing Slip

TO:		ACTION	INFO	DATE	INITIAL
1	DCI				
2	DDCI				
3	S/MC				
4	DDS&T				
5	DDI				
6	DDA				
7	DDO				
8	D/DCI/IC				
9	D/DCI/NIO				
10	GC	✓			
11	LC				
12	IG				
13	Compt				
14	D/Pers				
15	D/S				
16	DTR				
17	Asst/DCI				
18	AO/DCI				
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SUSPENSE		Date			

Remarks:

3637 (1-75)

18 FEB 1976